

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

RECEIVED
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MAY 15 2020
U.S. District Court
Middle District of TN

Name of Plaintiff(s)

Jason Patton

v.

Williamson County
City of Franklin
City of Brentwood
Defendant 1
Defendant 2
Defendant 3

Case No.

(To be assigned by Clerk)

03-20 0422

Name of Defendant(s)

Williamson County
City of Franklin
City of Brentwood
Defendant 1
Defendant 2
Defendant 3

COMPLAINT

1. State the grounds for filing this case in Federal Court (include federal statutes and/or U. S. Constitutional provisions, if you know them):

2. Plaintiff,

Jason Patton

resides at

Street address 813 Edwards Drive

City Franklin

County Williamson

State TN

Zip Code 37064

Telephone Number
(615) 416-2868

(If more than one plaintiff, provide the same information for each plaintiff below.)

3. Defendant, current and former government employees that resided in the same city sector as the Plaintiff.

 Street address

City

 County

State

Zip Code

Telephone Number

(If more than one defendant, provide the same information for each defendant below.)

4. Statement of claim. (State as briefly as possible, the facts of your case. Describe how each Defendant is involved. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary. Attach any documentation or exhibits in support of the complaint):

Comes now the Plaintiff Jason Patton files this complaint alleging the following claims.

NATURE OF THE CASE

1. Plaintiff brings this action against Williamson County, The City of Franklin, and the three said individuals in the Middle District of Tennessee for using government agency resources to defame the defendant while threatening his life.

PARTIES

JURISDICTION AND VENUE

2. The Defendants operated as government agents and subsidiaries from January 2010 until the present day. Defendant 2 has operated inside the jurisdiction as an employee since 1996.

GENERAL FACTUAL ALLEGATIONS

3. By using government resources, the Defendants contacted other police agencies in 3 jurisdictions during the Plaintiffs travel while working and doing college degree work from 2010 to 2019.

4. Said Defendants contacted the Knoxville Police Department and The University of Tennessee Knoxville Police in and around 2010 and 2011

- while the Plaintiff was enrolled as a student
5. The Defendants also contacted the police and fire departments via the International Association of Firefighters in Paris, France when the Plaintiff was taking a class on Matignon in 2012. This communication was facilitated by a dual police fire employee in the jurisdiction unmentioned as a defendant.
 6. The Defendants also contacted the Tennessee State University and Vanderbilt University police officers during the Plaintiffs enrollment as a graduate and undergraduate student.
 7. Once the second threat was made on the life of the Plaintiff, a second written email was written to the office of the District Attorney. The Plaintiff was then referred to the police agency that made the threat. No follow up occurred.
 8. One Defendant has been involved many years with real estate deals in the sector where the defendant and his family have lived for 40 years. The law is being used in an effort to remove the Plaintiff from the neighborhood and ruin his reputation.
 9. Recent officer involved shootings have more than doubled annually over the past few years and the Plaintiff is being threatened physically by the police.
 10. Because the Defendants proceeded in this manner, once the Plaintiff earned his graduate degree, entry into the workforce was impeded. Because much of the technology work in which he is involved requires a basic S85 clearance and clear 7 year background, the defamation and rumor mill caused by the Defendants prevented and delayed clearances.
 11. The Defendants used the "blue wall" to hinder the Plaintiffs law school admissions in an effort to stop this lawsuit from being filed.
 12. The background check in a 1996 police application referenced the Plaintiff's hometown which is also in the jurisdiction. The Defendants deliberately marred this file and questioned the Plaintiffs sexual orientation.
 13. The Defendants made the Plaintiffs whereabouts and personal habits their personal agenda in an effort to defame.
 14. The Defendants also sent female future and current officers to create relationships with the Plaintiff.
 15. The Defendants used police tools and the fire department to monitor the Plaintiffs whereabouts 24 hours a day from his mobile device (615) 601-4088, (615) 416-2868. This included the monitoring of residents at his location (615) 491-5785 (615) 496-8443 (615) 794-5581 (615) 496-8441.
 16. The Defendants used confidential informants in the workplace of the Plaintiff. They often violated law during this time making conditions difficult in an effort to defame and harass the Plaintiff.
 17. When employed outside the jurisdiction during the first days of the Plaintiffs employment (or interview process), the Defendants would send officers to the location to speak with management and building security of the Plaintiffs employment (MNPd, DCSO).

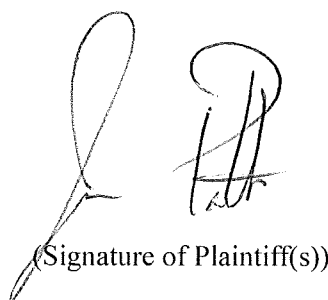
ADDITIONAL CONCRETE HARM

16. The Plaintiff has the right to travel jurisdictions free from secret police lists that are used in the probation and parole systems.
17. The Plaintiff has the right to attend university without police surveillance used for wanted perpetrators.
18. The Plaintiff has the right to not have to fear the police and police interaction.

19. The Plaintiff has the right to not have to fear for his life from police threat.
20. PRAYERS FOR RELIEF (LIST WHAT YOU WANT TO COURT TO DO):
- a. The Plaintiff wishes to be removed from all secret police lists.
 - b. The Plaintiff seeks monetary compensation for the clearance, loss of gainful employment, and law school university admissions in the amount of \$735,000.
 - c. Changing of evidence, witness coercion, secret police lists, and tracking should all be looked at by an independent body so that this doesn't happen to anyone else in this egregious manner.
 - d. The Plaintiff wishes to be removed from The Kroger Co.'s banned list. The Plaintiff has committed no crime on Kroger property.

I (We) hereby certify under penalty of perjury that the above Petition is true to the best of my (our) information, knowledge, and belief.

Signed this 14TH day of MAY, 2020



(Signature of Plaintiff(s))

Patton Consulting Services LLC

3117 Vera Valley Road • Franklin, TN 37064 • Phone (615) 601-4088 • Fax (800) 207-4206 •
pattonconsult@att.net

May 17, 2013

City Hall-The City of Franklin
109 3rd Avenue South
Franklin, TN 37064

Cc: shauna.billingsley@franklintn.gov, monique.m@franklintn.gov, ken.moore@franklintn.gov,
david.rahinsky@franklintn.gov, John Schroer, Eric.stuckey@franklintn.gov, russellr@franklintn.gov,
chancellor@utk.edu, provost@utk.edu, utpolice@utk.edu

To Whom It May Concern:

This notice is to serve as legal reference point for any statute of limitations concerning testimony and the illegal handling of evidence by the Franklin City Police Department in dockets # 94GSC-2006-CR-212048, 94GSC-2006-CR-212049, 94GSC-2009-CR-255149 prior to civil court filings.

The official court complaint will include fabrication of evidence and search in case number 94GSC-2006-CR-212048 along with witness coercion in case number 94GSC-2009-CR-255149 and the sequence of traffic citations that occurred with Mr. Patton from 2005-2007.

The civil filing concerns "class of one" equal protection claim by the plaintiff.

Defamation and harassment complaint content also includes notification by said agency to other municipalities and campus law enforcement in the U.S. and abroad during the plaintiffs degree work since 2010. Resources have been used as a personal attempt by the agency to prevent degree completion by the plaintiff and thus law school entry to prevent this pending suit.

This subjected the plaintiff to an open ended and indefinite investigation by the agency and affiliates. Plaintiff is currently subjected to retaliation locally by uniformed and plain clothed officer surveillance daily.

This notice and any later addendums are to serve currently as a civilian complaint against the agency concerning the criminal handling of evidence and defamation by use of sheriff departments, affiliate agencies, watch groups, and confidential informants to be filed in the internal affairs department along with the civilian review board. Individuals will be later mentioned in the court filing.

At this time I wish to request your cooperation once depositions begin to get a speedy result that benefits the plaintiff and defendants.

Sincerely,

son Patton

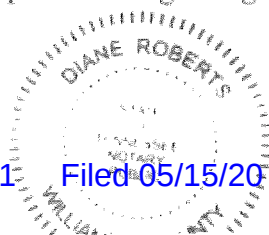
Case 3:20-cv-00422

Document 1

Filed 05/15/20

Page 5 of 11 PageID #: 5

My Commission Expires
January 24, 2017



Diane Roberts 6/25/13

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109 3RD AVENUE SOUTH
FRANKLIN, TN 37064

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A. Signature

Ellen A. Hansen

☐ Agent
☐ Addressee

B. Received by (Printed Name)

Ellen A. Hansen

C. Date of Delivery

6/25

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For delivery information visit our website at www.usps.com

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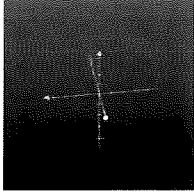
or PO Box No.

City, State, ZIP+4

FRANKLIN TN 37064

PS Form 3811, August 2003

See Back for Instructions



Patton Consulting Services LLC

813 Edwards Drive ▪ Franklin, TN 37064 ▪ (615) 601-4088 ▪ pattonconsult@att.net

Thursday March 10, 2016

This complaint is to serve as a second to a previous incident approximately two weeks ago with the Brentwood City Police Department.

I patronize the Siam Pad Thai restaurant in Cool Springs one to two times per week after my Master's (computer information systems engineering) course at night in Nashville, TN. I am a resident of Franklin and use the restaurant to gain airline miles for my business.

Two of the last four times, Brentwood City officers, most recently Phelan, came in shortly after I arrived and conducted themselves in a fashion that embarrassed me in front of the restaurant staff and other patrons. The staff and other customers made comments as it was obvious I was the subject of police attention.

On the date listed above Officer Phelan came into the empty restaurant (there was one other customer) walked directly to the table I was at and almost touched my food as I sat down. He was so close that I asked if it was ok to sit down. He then sat at the table directly behind me in an empty restaurant with body language that made it obvious he was watching me. It was very passive aggressive and me feel uncomfortable. It was during this incident that I called the Brentwood Police Department to ask why he was there and if I was being arrested or investigated. I spoke with Sergeant Miller who referred me to Lt. Knight for official complaints after warning me I could be sued for frivolous claims.

The incident two weeks ago involved 3 officers-2 men and a woman.

In order to understand the significance of these incidents I have attached a notarized document that is the cause for me being placed on an unofficial police watch list. An officer that I don't want to mention at this time that works with said department has threatened my life. Hopefully this complaint will be filed through the proper channels as the Franklin City Police Department has ignored several requests (Alderman McClendon and Officer Butler never followed through) to file a complaint because of the lawsuit in the works.

The purpose of this complaint is to note the liaison with Franklin City Police Department by the Brentwood officers involved. One more Brentwood city police officer should be noted in this liaison because of his residence at 3119 Vera Valley Road in Franklin, TN during some of the incidences in question. During these years I lived at 3117 Vera Valley Road in Franklin, TN.

Jason Patton

From: **Kelly A. Lawrence** kalawrence@indagc.org
 Subject: RE: Per conversation on 10-4-Jason Patton-important attachments
 Date: November 22, 2016 at 10:02 AM
 To: Patton Consulting Services LLC pattonconsult@att.net



Mr. Patton,

I have received your e-mail as well as your follow-up voicemail from earlier this week, however as I previously stated to you in court, our office does not supervise local law enforcement agencies. If you have a complaint or grievance against a particular officer and/or agency, it must be addressed directly with that agency.

Sincerely,
 Kelly Lawrence

From: Patton Consulting Services LLC [<mailto:pattonconsult@att.net>]
Sent: Friday, October 07, 2016 9:13 AM
To: Kelly A. Lawrence
Cc: shauna.billingsley@franklin.tn.gov; deb.faulkner@franklin.tn.gov; dustyr@williamson-tn.org
Subject: Per conversation on 10-4-Jason Patton-important attachments

Ms. Lawrence,

Thanks for the email address.
 Please view the attached documents.
 I'm willing to meet with your office once to give you a background on the threats to my life.

The night I was pulled over for a dim rear license plate, either Officer Kit or the Captain that showed up threatened to kill me.

I couldn't see because of the patrol car lights, but after developing a rapport and passing a sobriety test, They told me to get my items out of the vehicle. One of them said "Let's light him up".

This is what I deal with daily with 24 hour police surveillance that you have to be aware of.

Most every time I leave or return home there's a patrol unit either following me aggressively or in the the lane of oncoming traffic. Many times they pull me over outside my house or they'll be parked outside when I leave or return home. Local police are at almost every business establishment when I patronize it. I have a timestamped calendar log and some pictures over the years from when the interaction became offensive. I know you have an understanding of this so there's no need to mention off duty police, the PBA, or veterans associations.

I work nights in a restaurant for benefits while pursuing a dual MBA prior to law school. What your police are doing is contacting upper management of employers and potential employers (Davidson County also) concerning me behind the guise of workplace violence. Police have used confidential informants in the restaurants I've been employed in since 2013. They use drugs on the premises and try to start physical altercations while creating an aura of suspicion around me individually. One CI threatened to kill me in 2013. This makes it impossible to advance inside the company to roles for which I'm qualified.

In addition to the restaurant, police contact the homeowner's associations in places where I go jogging. So once again, all persons are on alert of my daily function.

You have almost all the information you need except for the first threat on my life almost 9 years ago. I'm giving you this because I believe you have to follow up. Until now, as I expected, everyone has tried to rid themselves of this complaint.

Meanwhile, I'm writing cease and desist letters to the companies involved to beat the statute of limitations prior to filing a civil suit.

Sincerely,

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PHONE: (615) 416-2868



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Priority Mail: ☒ Day ☐ 2-Day ☐ Military ☐ DPO
Postage: \$26.35
Insurance Fee: \$
COD Fee: \$
Signature Required: ☒ No ☐ Yes
Signature Required Time: 11:00 AM - 3:00 PM
Time Accepted (MM/DD/YYYY): 5/14/20
Time Delivered (MM/DD/YYYY): 5/14/20
10:00 AM Delivery Fee: \$5.00
Special Handling Fee: \$
Sundays/Holidays Premium Fee: \$
Total Postage & Fees: \$31.35
Weight: 3.1 lbs.
Dimensions: 12x12x12
Delivery Point (MM/DD/YYYY): 5/14/20
Employee Signature: [Signature]
Delivery Agent (MM/DD/YYYY): 5/14/20
Employee Signature: [Signature]

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